

October 18, 2016

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Business Data Services in an Internet Protocol Environment et al., WC Docket
Nos. 16-143, 15-247, and 05-25 and RM-10593*

Dear Ms. Dortch:

On October 14, 2016, Robert Prunn, International Representative, International Brotherhood of Electrical Workers (IBEW) and Kathleen Abernathy, Executive Vice President, External Affairs, Frontier Communications, met with Commissioner Jessica Rosenworcel and Travis Litman, Wireline Advisor to Commissioner Rosenworcel.

The representatives of IBEW and Frontier discussed the significant repercussions that new price regulation would have on good, middle-class jobs and broadband investment. Tens of thousands of IBEW members install, maintain, and support the business data services (BDS) provided by incumbent local exchange carriers (ILECs) like Frontier. IBEW and Frontier explained that if the FCC imposes BDS price cuts – at a time when there has never been more competition in the BDS market – it would undermine investment, hurt competition, and ultimately put union jobs at risk.

It was pointed out that Frontier, CenturyLink, AT&T, and other ILECs employ unionized workers with collectively-bargained wages, benefits, and working conditions. Meanwhile, competitive local exchange carriers, wireless companies (with the notable exception of AT&T), and cable companies generally block organized labor and do not provide the same level of pay, benefits, or working conditions. Considering that BDS agreements are most often agreements between large, well-capitalized companies, the Commission should not penalize companies that use organized labor by artificially favoring those that do not.

With the extensive evidence of vigorous competition in the BDS market, IBEW and Frontier strongly urged that the Commission should avoid the drastic 11% “catch up” rate reduction in the current proposal; any rate reductions must be significantly less in order to match the data on the record and Frontier’s own experiences with competition and productivity in the BDS market. The parties also stressed the importance of including ample transition times for any BDS rate reductions in order to allow companies to manage the impact.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen Q. Abernathy".

Kathleen Q. Abernathy
Executive Vice President, External Affairs
Frontier Communications